

DECLARATION OF MARGARET HALL OFFENBACH

My name is Margaret Hall Offenbach. I am an adult resident of Allegheny County, Pennsylvania. I state as follows:

1. Jay Hall was my older brother. Jay was the oldest, then my brother, Bill, and I am the youngest.
2. When my brother Jay and Carol first got married they lived with my parents for about a year. Later they lived in my parents' garage which had been converted into a little cottage. Four of their children were born during the time they lived in this little house. I was still living at home at this time.
3. After they moved to the house Jay built in the country, the children were frequently at my parents' home. My mother frequently had one or two of my brother's children. After I married and lived in Pittsburgh, when Mother visited us she would bring one or two of the children along for holiday dinners. My mother worked two jobs but she always had time for Jay's children. Carol's parents helped raised Sheryl. Sheryl spent a large portion of her childhood years with Carol's parents in Stahlstown, Pennsylvania on her grandparents farm.
4. My brother, Jay, tried as hard as he could. Jay said it was a wonderful feeling to be able to provide a home and food for his family. He was so thrilled when Debbie, his second oldest child, went to college to become a teacher.
5. My brother, Bill, had a farm. Jay, Jr. and Jeff would usually spend the summer months with Bill on the farm.
6. Jay and Carol had a volatile relationship. Jay lived through a lot. I would become distressed about Jay's situation when he confided in me.
7. After I was married I lived in Pittsburgh. Jay worked in Pittsburgh. On nights when he had a union meeting, he would shower and change clothes at our house to attend the union meetings.
8. Jay would tell us about some of the problems in his relationship with Carol. Jay contemplated divorce and they even separated at one point. However, he felt that courts tended to award children to the mother. He did not want to lose the children so he felt he had to go back home and try to live peaceably.
9. Jay told me that one time while at work he thought he was having appendicitis attack, it was early spring and he went home early. When he pulled into the garage he saw Jon crying and kicking the door trying to get in. Jon was outside alone. Jon was either too little to turn the door knob or was locked out.

10. After Jay's death and the funeral Carol was very negative about Jay. So, I distanced myself from her. I loved and respected my brother. He was blamed for all problems in their marriage. I know it takes two people to create a problem in a marriage and it hurt me to have all the blame placed on my brother.
11. Jay was highly respected by the people he worked with and was an active participant in the union.
12. Carol remarried soon after Jay died. I was embarrassed for my friends to know Carol had remarried so soon.
13. Jay had told me that Carol had received stock in an inheritance from her aunt. After Jay died, I know that my parents would have helped Carol if she had needed financial help to keep the house.
14. I was not contacted by Jon's attorneys prior to his trial. If they had contacted me, I would have told them about the above matters and probably would have remembered more details than I recall now.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


Margaret Hall Offenbach

8/20/09
Date